From:	Smith, Yvonne
To:	Mark Seaman
Cc:	Groh, Nathan; Regan, Tara; Rogers, Tim; Brad.Azeltine@iowadot.us; brittany.barrientos@stinson.com; George Lynn; Chiccine, Catherine; Williams, Mike; Kennedy, Sharon
Subject:	FW: Engineering Evaluation/Cost Analysis Work Plan - Former Citizens Gas and Electric MGP site Council Bluffs, IA
Date:	Friday, December 11, 2020 10:39:00 AM
Attachments:	EECA Work Plan_20201211.pdf image002.png

Mark and all,
I acknowledge receipt of the EE/CA Work Plan in response to the ASAOC referenced below. I am submitting to file on 12/11/2020 and will provide a letter of approval or comments for modification for Work Plan approval once it has been reviewed. Happy Holidays to all and will keep all informed if the review will go beyond 12/31.

Respectfully,

Yvonne M. Smith | On-Scene Coordinator

Response, Removal and Oil Preparedness Section
Superfund Emergency Management Division
U.S. Environmental Protection Agency, Region 7
P 913-551-7795 | 11201 Renner Blvd., Lenexa, KS 66219
smith.yvonne@epa.gov

From: Mark Seaman <Mark.Seaman@erm.com>
Sent: Friday, December 11, 2020 10:25 AM
To: Smith, Yvonne <smith.yvonne@epa.gov>
Cc: Groh, Nathan <Nathan.Groh@blackhillscorp.com>; Regan, Tara <Tara.Regan@blackhillscorp.com>; Rogers, Tim <Tim.Rogers@blackhillscorp.com>; Brad.Azeltine@iowadot.us; brittany.barrientos@stinson.com; George Lynn <George.Lynn@erm.com>
Subject: Engineering Evaluation/Cost Analysis Work Plan - Former Citizens Gas and Electric MGP site Council Bluffs, IA

Yvonne,

I hope this note finds you doing well. Please find attached for your review the Engineering Evaluation/Cost Analysis Work Plan compiled for the former Citizens Gas and Electric Manufactured Gas Plant (MGP) site in Council Bluffs, Iowa. The attached work plan has

been compiled in response to the submittal request in the Administrative Settlement Agreement and Order on Consent (ASAOC), CERCLA Docket No. 07-2020-0089.

Just let me know if you have any questions or please give me a call if you'd like to discuss in more detail.

Best Regards,

Mark E. Seaman, PE
Principal Consultant

ERM
345 Woodcliff Drive, 2nd Floor | Fairport, New York 14450
M 515-681-1025 | **E** Mark.Seaman@erm.com
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Engineering Evaluation/Cost Analysis Work Plan

Former Citizens Gas and Electric
Manufactured Gas Plant, Council Bluffs, IA

Black Hills/Iowa Gas Utility Company, LLC

11 December 2020

Project No.: 0563207

The business of sustainability

ERM

Signature Page

11 December 2020

Engineering Evaluation/Cost Analysis Work Plan

Former Citizens Gas and Electric Manufactured Gas Plant, Council Bluffs, IA

C. George Lynn
Partner

Laura Judd
Senior Project Manager

Mark E. Seaman P.E.
Principal Consultant

Environmental Resources Management
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St. Louis, MO 63141

CONTENTS

List of Figures

Acronyms and Abbreviations

Name	Description
ARAR	Applicable or Relevant and Appropriate Requirements
ASAOC	Administrative Settlement Agreement and Order on Consent
BHC	Black Hills/Iowa Gas Utility Company, LLC
CERCLA	Comprehensive Environmental Response, Compensation, & Liability Act
CGE	Citizens Gas and Electric Company of Council Bluffs
COI	Contaminants of Interest
EE/CA	Engineering Evaluation/ Cost Analysis
EPA	United States Environmental Protection Agency
ERM	Environmental Resources Management
FMGP	Former Manufactured Gas Plant
IDNR	Iowa Department of Natural Resource
NTCRA	Non-Time Critical Removal Action
RAGS	Risk Assessment Guidance for Superfund

1. INTRODUCTION

On behalf of Black Hills/Iowa Gas Utility Company, LLC (BHC), Environmental Resources Management Inc. (ERM) has prepared this Work Plan for preparation of an Engineering Evaluation/Cost Analysis (EE/CA) for the Citizens Gas and Electric Company former manufactured gas plant Site (the "Site"). This document was prepared to satisfy the requirements of the Administrative Settlement Agreement and Order on Consent (ASAOC), CERCLA Docket Number 07-2020-0089, for the EE/CA. The effective date of the ASAOC is 30 September 2020.

The purpose of this EE/CA Work Plan is to describe the tasks to be completed to support the EE/CA and establish a schedule for the submission of the draft Conceptual Site Model (CSM), draft Streamlined Risk Assessment, and subsequent submittal of the draft EE/CA report to the United States Environmental Protection Agency Region 7 (EPA).

The work scope outlined in this EE/CA Work Plan has been developed in general compliance with EPA "Guidance on Conducting Non-Time-Critical Removal Actions under CERCLA" (EPA/540-R-93-057).

1.1 Work Plan Organization

The remainder of this work plan is organized as follows:

- **Section 2.0 – Site Description** provides a brief description and overview of the Site.
- **Section 3.0 – Scope of Work** outlines the proposed scope of work associated with the identification and analysis of removal action alternatives.
- **Section 4.0 – Deliverables** presents a list of future deliverables that will lead to the final EE/CA development.
- **Section 5.0 – Schedule** present the projected submittal schedule for the work associated with the final EE/CA.
- **Section 6.0 – References** present the list of documents cited and reviewed for preparation of this work plan.

2. SITE DESCRIPTION AND BACKGROUND

The Citizen's Gas and Electric Company (Citizens) site is located between South 6th and 8th Streets (bounding east and west respectively), and 10th Avenue and a Chicago, Burlington, and Quincy (CB&Q) rail line (bounding north and south respectively) in Council Bluffs, Pottawattamie County, Iowa (the "Site" or "Facility"). The Site is in the southwest ¼ of Section 36, Township 75 North, Range 44 West (U.S. Geological Survey [USGS] 1994). The site encompasses approximately 4.75 acres, and **Figure 1** provides a site location map.

The Citizen's Gas and Electric site operated as a gas manufacturer from 1870 to 1930. Coal carbonization was the implemented gasification method at the site from 1870 to 1882. Oil replaced coal in the gasification process in 1882. However, coal gas equipment was maintained at the facility until at least 1949 (Dames and Moore 1990). Contaminants and wastes typically associated with gas production include oxide waste, tar residues, sludge, wastewater, ash, and phenolic and ammonia compounds. By-product tars produced during gasification at the site were refined into products (i.e., creosote, road tars, and fuels) or disposed of on site (EPA 1993). By 1930, Council Bluffs had converted to natural gas, relegating the plant to operational status for emergency use only. In 1952, a propane air plant began operating at the site (Barr Engineering Company [Barr] 1995). A majority of structures associated with the former manufactured gas plant (FMGP) have since been demolished. **Figure 2** provides a general Site Layout Map with details related to the FMGP site buildings and structures.

2.1 Facility Ownership

The following summary of ownership is provided as presented in the ASAOC, and is intended for background purposes only;

- The initial manufactured gas plant was owned by Council Bluffs Gas Light Company from the early 1870s to the early 1890s. Sometime in the 1890s, Council Bluffs Gas Light Company reincorporated into Council Bluffs Gas and Electric Company. Citizens Gas and Electric Company of Council Bluffs (CGE) leased the gas plant from Council Bluffs Gas and Electric Company from 1900 to 1904. In 1904, CGE bought the plant and continued to operate it until 1928. Council Bluffs Gas Company (CBGC) purchased the plant from CGE in 1928 and continued operating it until at least 1932.
- In 1929, CGE changed its name to Citizens Power & Light Company. In 1937, Citizens Power & Light Company merged into Nebraska Power Company. In 1946, Omaha Public Power District (OPPD) acquired all issued and outstanding common stock of Nebraska Power Company, and Nebraska Power Company was later liquidated into OPPD.
- CBGC sold the Site property to Northern Natural Gas Company (NNG) in 1960, and CBGC was acquired and merged into the Peoples Natural Gas Company (Peoples) division of NNG. In 1980, NNG changed its name to Internorth, Inc. (Internorth). In 1985, Utilicorp United, Inc. (Utilicorp) bought Peoples' assets and the Site property from Internorth as part of an asset purchase. Internorth retained Peoples' liabilities. Internorth changed its name to Enron Corporation (Enron) on April 17, 1986. On July 14, 1986, Enron created a wholly-owned subsidiary named Enron Holdings, Inc. On April 11, 1990, Enron Holdings, Inc. changed its name to NNG. On January 31, 2002, Dynegy, Inc. purchased NNG from Enron. On August 16, 2002, MidAmerican Energy Holdings Company (MEH) purchased NNG from Dynegy, Inc. MEH changed its name to Berkshire Hathaway Energy Company in 2014. MidAmerican Energy Company is a direct subsidiary of Berkshire Hathaway Energy Company.
- In 1972, the Iowa State Highway Commission, n/k/a Iowa Department of Transportation (IDOT), acquired a portion of the site from Peoples to construct a highway. In 1978, IDOT acquired another

portion of the site for the same purpose from Union Pacific Railroad Company (UPRC), who purchased portions of the Site in 1898 and 1899. IDOT constructed a highway on these portions of the Site in the mid-1970's. IDOT later transferred jurisdiction of the highway, including these portions of the Site, to the City of Council Bluffs, Iowa in 2019, pursuant to Iowa Code section 306.42. Over the years, UPRC sold various parcels it owned within the Site, and in 2012, UPRC quitclaimed the remainder of its parcels of Site property to the City. The City is a current owner of two parcels of property located within the Site.

- In 1986, Utilicorp sold portions of the Site property to Linda Whisler, but maintained ownership of the majority of the Site. In 2002 Utilicorp changed its name to Aquila Inc., and in 2008, Aquila, Inc. sold the remainder of the Site property it owned to Black Hills Corporation. Black Hills Corporation is a current owner of multiple parcels of property located within the Site.
- In 2018, Linda Whisler sold a parcel of property located within the Site to T & A Real Estate, L.L.C. T & A Real Estate, L.L.C. is the current owner of a parcel of property located within the Site.
- During the initial evaluation of Potentially Responsible Parties ("PRPs"), Northern Natural Gas, MidAmerican Energy Company, Omaha Public Power District, the City of Council Bluffs were each identified by EPA as Respondents having some association and involvement with the Site. General Notice Letters were sent by EPA to those entities and their respective inclusion as a PRP was evaluated. However, each of the aforementioned entities denied liability and declined to participate in the EE/CA Settlement. Respondents and EPA made the decision to proceed with the EE/CA Settlement and reserve all rights as to these entities.
- Respondents and Owner Respondents identified in the ASAOC include Black Hills/Iowa Gas Utility Company, Iowa Department of Transportation, and T&A Real Estate, LLC.

2.2 Site and Surrounding Land Use

As stated above, the former Citizens property is currently owned by BHC. The western block (between South 7th and 8th Streets) of the Site currently consists of a vacant, grass-covered lot (north portion) and a fenced gravel lot (south portion). No structures are present within this block. The block between South 6th and 7th Streets currently consists of a vacant commercial building (south portion) and a Black Hills Energy facility (north portion). RCI Roofing Supply Company, Inc. (RCI) operates east of South Expressway.

A Site and Surrounding Area Map indicating adjacent neighbors to the Site is provided as **Figure 3**. The following summary describes the current adjacent properties;

- **East**: Two properties are located immediately east of the Site. The northern most property is owned by Roofing Supply Company, Inc. It covers 0.59 acres and consists of one warehouse/office building surrounded by a paved parking lot. The southern-most property is owned by Joseph M and Michelle S Bates. The property is 0.14 acres and consists of one warehouse building. A larger paved parking lot is located immediately east of this property.
- **West**: The property to the west of the Site is owned by the City of Council Bluffs. This parcel covers 8.87 acres and consists of four buildings. It is utilized as a municipal government operations facility.
- **North**: Two properties are located to the north of the Site. The eastern-most property, which is partially located on-Site, is owned by BHC and consists of 0.68 acres. One small building is located on the center of the property, and the remaining land is covered by pavement and/or gravel. The next adjacent property to the north is A Vital Corporation (Vital Sign) which measures 0.63 acres and contains one building. The adjacent western-most property is a vacant, grassy 0.76-acre lot, owned by the City of Council Bluffs.

- **South**: Three properties are located south of the Site. The western-most property is owned by Oxley, Lloyd M-Janice Trusts and consists of four storage buildings on 0.95 acres. The center property is owned by C B Lucky 7 LLC and consists of one building. The western-most property is owned by Driver Properties LLC, and consists of two metal warehouses on 0.68 acres.

2.3 Previous Investigations

The Site has a long history of investigation activities from 1969 through 2015. The following provides a brief summary of the investigation activities conducted to date;

- 1969 - The Iowa Department of Transportation (Iowa DOT) conducted a subsurface investigation in support of the Highway 192 expressway construction.
- 1990 - Dames & Moore completed a Phase I Investigation of the site (then referred to as Peoples Natural Gas [PNG]) in April 1990.
- 1990 - Ecology and Environment, Inc. (E&E), on behalf of EPA Region 7, completed a Preliminary Assessment (PA) of the site in November 1990.
- 1995 - Barr completed a Phase II Investigation of the site in October 1995.
- 2015 – Tetra Tech completed a Removal Assessment on behalf of EPA Region 7 in December of 2015.
- 2017 – Tetra Tech completed a geophysical survey on site as summarized in a report dated July 17, 2017.

3. SCOPE OF WORK

3.1 Conceptual Site Model

3.1.1 Site Description, Background, and Data Comparison

As part of the CSM, a full Site description will be provided including physical, demographic, and other applicable characteristics. The CSM will include details on the Site setting including region characteristics such as municipal water use, geology, hydrogeology, and Site-specific geology and hydrogeology based on data collected to date.

All available historical reports will be reviewed to support developing a thorough description of current and historical information as well as a summary of all available data collected and reported to date. The CSM will include tabulation of all available data with comparison of the contaminant concentrations to the applicable EPA Region Screening Levels (RSLs) (groundwater RSLs for tap water, and soil RSLs for industrial use). The data tables will provide comparison to the RSLs to support estimating the nature, extent, and magnitude of the contaminants of interest (COI). If appropriate, figures will be generated to help visualize the data.

Based on available Site data, and the extent of the investigations performed by EPA, no further sampling is currently anticipated to be necessary at this time. Therefore, a Quality Assurance Project Plan (QAPP), Sampling and Analysis Plan (SAP), and Field Sampling Plan (FSP) will not be submitted for the current scope of work.

3.2 Streamlined Risk Assessment

As part of the EE/CA, a streamlined risk assessment (SRA) will be conducted that focuses on the potential exposures, hazards, and risks posed by residual impact in soil and groundwater at the Site. Existing data provided by EPA will be used to conduct human health and ecological risk evaluations in accordance with EPA guidance, including but not limited to “Risk Assessment Guidance for Superfund, Volume I - Human Health Evaluation Manual (Part A)” (RAGS, December 1989), and “Ecological Risk Assessment Guidance for Superfund (ERAGS), Process for Designing and Conducting Ecological Risk Assessments” (ERAGS, June 1997), respectively, and related guidance.

According to EPA EE/CA guidance, the SRA is intermediate in scope. While it is more detailed than a limited risk evaluation conducted to support emergency removal actions, it is less comprehensive than a baseline risk assessment typically completed as part of a CERCLA remedial investigation (RI)/Feasibility Study (FS). The intention of a standard SRA is to provide sufficient detail to inform and justify an appropriate response action to address known impacted Site media.

ERM understands that benzene, toluene, ethylbenzene, and xylenes (BTEX) and polycyclic aromatic hydrocarbons (PAHs) are present in the soil and groundwater at the Site above their maximum contaminant levels (MCLs), EPA regional screening levels (RSLs) and removal management levels (RMLs). The SRA will utilize the historic data[1] to understand the nature and extent of these COI in soil and groundwater, as well as to identify what additional COI may be present, if any.

Based on the fate and transport characteristics of the COI and Site-specific hydrogeology, the potentially relevant exposure pathways to human and/or ecological receptors will be identified along with the applicable routes of potential exposure (e.g., ingestion, dermal contact, inhalation of particulates and/or vapors), followed by the assessment of the human health and environmental risks associated with the COI.

[1] Phase 1 preliminary investigation by Dames & Moore (1990), Phase II environmental site assessment by Barr Engineering (1995), and removal assessment by Tetra Tech (2016)

As part of quantifying risk, the SRA may utilize models to estimate concentrations of VOCs that may be present under current or potential future conditions is indoor, trench, or outdoor air, as appropriate. For example, the Johnson and Ettinger model (EPA, 2017) may be used to model indoor air concentrations from groundwater, and other models may be used to estimate VOC concentrations in on-Site excavations that could occur during construction activities. Modeling results will be used to support the back-calculation of appropriate Removal Action Objectives (RAOs), which will integrate all applicable exposure routes of potential concern identified for each receptor population.

3.2.1 Identification of Removal Action Objectives

RAOs for human health will be developed for soil and groundwater based on EPA's acceptable cumulative excess lifetime cancer risk range of 1E-04 to 1E-06, or non-carcinogenic hazard quotient (HQ) threshold of one (1.0). For individual COI with potential cancer risk, RAOs will be set such that a cumulative CR of 1E-04 is not exceeded. For individual CVOCs with non-cancer effects, EPA methods allow for limiting cumulative concerns to those that affect the same target organ. Accordingly, RAOs for individual CVOCs will be set such that the total HQ for a specific organ group does not exceed 1.0.

If appropriate, RAOs for ecological receptors will also be developed to reduce identified risks resulting from direct exposure to COI and/or exposure to COI through the diet.

A report will be prepared that presents the results of the COI identification, exposure pathways analysis, receptors populations and exposure routes of concern, and RAOs based on the protection of each receptor group and exposure pathway combination. All modeling and calculation equations, input parameters, and output results will be documented in a final report. The EE/CA will present the broad scope and objectives of the removal action and how these objectives align with federal and state Applicable or Relevant and Appropriate Requirements (ARARs).

3.3 Evaluation of Engineering Alternatives

Response action alternatives will be assessed in accordance with Section 2.6 of EPA's "Guidance on Conducting Non-Time-Critical Removal Action Under CERCLA". This assessment of response action alternatives and the streamlined risk assessment will govern the selection of the appropriate response action.

To ensure the collection of pertinent data/information, a range of potential remedial alternatives have been considered to-date. These are based on historical responses at other similar sites, EPA guidance, available technologies, and a general understanding of the Site requirements. Potentially-applicable response action alternatives for the Site, if required, may include the following:

- **No Action** – No removal action will be performed because no risk to human health and the environment is posed by the contamination.
- **Limited Source Area Removal Action** – Excavation of limited source areas within the property boundaries (ie. Former gas holders, relief holder, and tar well). This option will include reviewing treatment and/or disposal of waste. This alternative may be proposed as a standalone remedy or in conjunction with other groundwater remedial options.
- **RAO Exceedance Removal Action** – Risk to human health and the environment is posed by the Site impact, soils exceeding the RAOs and that are reasonably accessible on Site will be removed. This option will include reviewing treatment and/or disposal of waste. The alternative may be proposed as a standalone remedy, or in conjunction with other groundwater remedial options.

The alternative(s) ultimately identified will be evaluated in accordance with, and in consideration of, the goals of the ASAOC and the EE/CA guidance document. The ability of each alternative to reduce the exposures identified in the human health risk assessment to within the acceptable range will be assessed. Other key evaluation criteria will include technical effectiveness, implementability, and cost.

A comparative analysis will be conducted to document the advantages and disadvantages of each alternative with respect to the criteria and each other. The comparative analysis will be used to determine the most appropriate response action alternative, or combination of alternatives, in terms of the evaluation criteria.

4. DELIVERABLES

In accordance with the ASAOC, EPA's "Guidance on Conducting Non-Time- Critical Removal Action Under CERCLA", and industry-standard project control procedures, various submittals will be prepared associated with preparation of this EE/CA.

The project deliverables as outlined in the ASAOC are summarized as follows;

- **Quarterly Progress Reports:** Quarterly progress reports will be submitted to the EPA until EE/CA completion.
- **EE/CA Work Plan:** The details of the work plan are presented herein.
- **Conceptual Site Model:** The Conceptual Site Model (CSM) will be prepared following EPA's acceptance of the Final EE/CA Work Plan. As outlined in the ASAOC, the CSM will be provided as a standalone document outlining the basis for the development of the Risk Assessment.
- **Streamlined Risk Assessment:** The SRA will be prepared following EPA's acceptance of the CSM. The SRA will include development of the proposed RAOs as outlined in the ASAOC.
- **Draft EE/CA Report:** The EE/CA Report will be prepared upon EPA's acceptance of the EE/CA Work Plan, CSM, and SRA. The report will consist of three main components:
    1) site characterization;
    2) identification of removal action objectives; and
    3) identification and analysis of removal action alternatives.
- **Final EE/CA Report:** After EPA review, a final report will be submitted that incorporates EPA comments on the draft EE/CA.

5. SCHEDULE

As outlined in the ASAOC, the following summary table presents the projected deliverables schedule to support and complete the EE/CA;

Projected Deliverables Schedule

Deliverables	Completion Date
Quarterly Progress Reports	Submitted to EPA generally on or before the 10th of the month following end of the calendar quarter (ie. January 10, 2021 for Q4 2020 Progress Report)
EE/CA Work Plan	On or before December 14, 2020
Conceptual Site Model	Within 75 days of EPA approval of the Final EE/CA Work Plan
Streamlined Risk Assessment	Within 75 days of EPA approval of the Final Conceptual Site Model
Draft EE/CA Report	Within 75 days of EPA approval of the Final Streamlined Risk Assessment
Final EE/CA Report	Within 60 days of receipt of EPA comments on the Draft EE/CA Report

6. REFERENCES

United States Environmental Protection Agency, RAGS, December 1989, *Risk Assessment Guidance for Superfund, Volume I - Human Health Evaluation Manual (Part A)*

Dames & Moore, April 1990, *Phase I Investigation for Peoples Natural Gas, Council Bluffs, IA*

United States Environmental Protection Agency, 1993, *Guidance on Conducting Non-Time-Critical Removal Actions under CERCLA (*EPA/540-R-93-057)

Barr Engineering, October 1995, *Phase II Investigation Report, Citizens Gas and Electric Company Site, Council Bluffs, IA*

United States Environmental Protection Agency, June 1997, *Ecological Risk Assessment Guidance for Superfund (ERAGS), Process for Designing and Conducting Ecological Risk Assessments*

Tetra Tech, April 2016, *Removal Assessment Report, Citizens Gas and Electric Company Site, Council Bluffs, IA*

Tetra Tech, July 17, 2017, *Citizens Gas & Electric Geophysical Survey Summary*

FIGURES

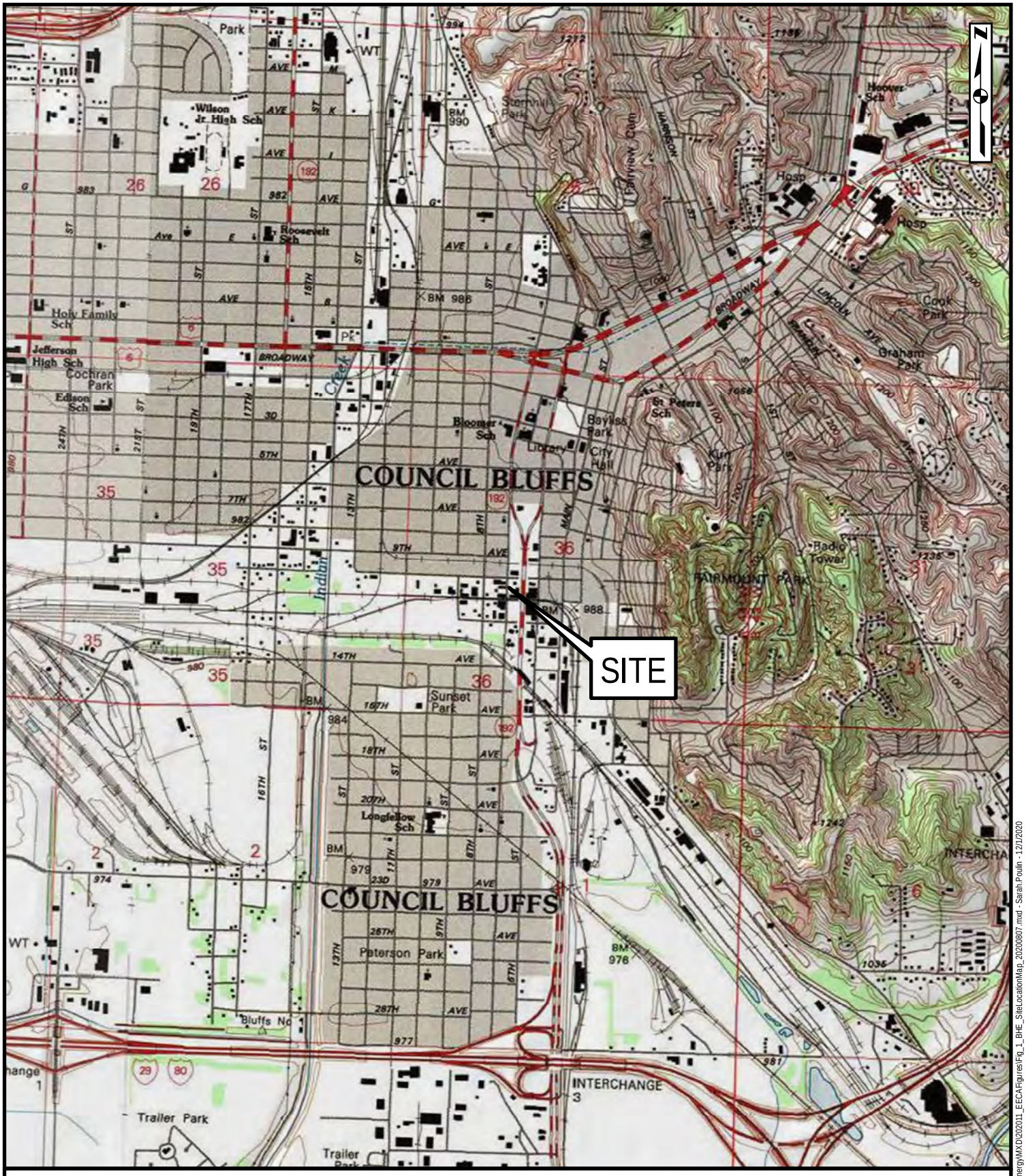

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Figure 1. Site Location Map
Citizens Gas and Electric FMGP Site
Council Bluffs, Iowa

SOURCE
USGS scanned topographic quad maps provided by National Geographic Society (© 2020).

ERM

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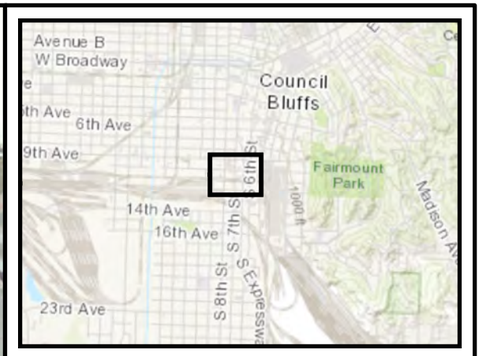

Legend

- Former Gasometer/Tar Pit
- Former Gasometer
- Historical Building
- Approximate Site Boundary

NOTES:

1. Aerial Imagery: ESRI World Imagery
   Reproduced under license in ArcGIS 10.7
2. Figure Source = Tetratech 2016-04-25
   Removal Assessment Report

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Figure 2:
Site Layout Map

Citizens Gas and
Electric FMGP Site
Council Bluffs, Iowa

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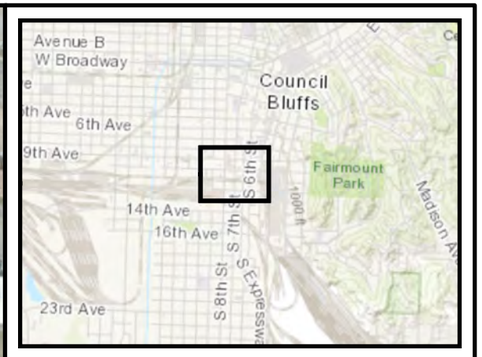

Legend

- Approximate Site Boundary
- Parcel Boundary

NOTES:

1. Aerial Imagery: ESRI World Imagery Reproduced under license in ArcGIS 10.7
2. Parcel data was retrieved from Pottawattamie County Assessor database on 11/9/2020

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Figure 3:
Surrounding Areas Map
Citizens Gas and Electric
FMGP Site
Council Bluffs, Iowa

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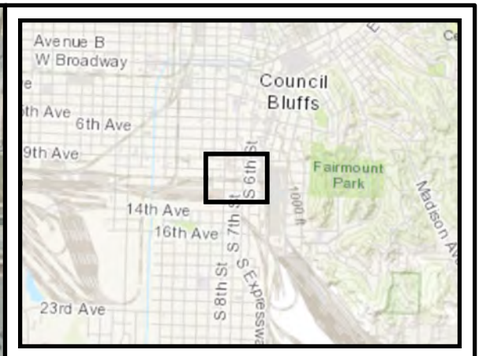

Legend

- Former LUST Location
- Monitor Well Location
- DPT Soil Boring/Groundwater Location
- Former Gasometer/Tar Pit
- Former Gasometer
- Historical Building
- Approximate Site Boundary

NOTES:

1. Aerial Imagery: ESRI World Imagery Reproduced under license in ArcGIS 10.7
2. DPT = Direct Push Technology
3. LUST = Leaking Underground Storage Tank
4. Figure Source = Tetratech 2016-04-25 Removal Assessment Report

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Feet

Figure 4:
Sample Location Map
Citizens Gas and Electric
FMGP Site
Council Bluffs, Iowa

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